



SEPULVADO & MALDONADO, PSC

ATTORNEYS AND COUNSELORS AT LAW

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November 8, 2013

BY ELECTRONIC AND REGULAR MAIL:

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Wanda Calderón
Regional Freedom of Information Officer
U.S. EPA, Region 2
290 Broadway, 26th Floor
New York, NY 10007-1866
calderon.wanda@epa.gov

Re: Freedom of Information Act Request

Dear Ms. Calderón:

Pursuant to the Freedom of Information Act ("FOIA"), 5 U.S.C. § 552 *et seq.*, we hereby request all documents, records, reports, data, or summaries thereof related to sampling, testing, or monitoring for methyl tertiary butyl ether ("MTBE"), or any contaminant or chemical constituent that may render water resources unusable for their intended use, consistent with regulations governing the classification of surface or ground waters, and shall include, without limitation, all substances or chemical constituents regulated by drinking water standards established by the government of the Commonwealth of Puerto Rico or the United States of America for the following site:

Celia's Laundry
CERCLIS EPA ID PR 002196368
247 Eleanor Roosevelt Street
San Juan, PR 00910

Specifically, we are requesting the following information:

- Analytical Results: We request all analytical reports of results for soil and water samples collected from Celia's Laundry, the site mentioned above; this should include both detected results and laboratory reporting limits for non-detect results for MTBE, and any other analytical parameters for which these water samples were analyzed as well as any other underlying data.
- Sample Collection Date: For each analytical result, we are also requesting the date on which the sample was collected, the date analyzed and the protocol and analytical method utilized.
- Sample Collection Location: For each analytical result, we are requesting the location identified using GPS; location coordinates should be provided in either latitude/longitude or universal transverse Mercator ("UTM") coordinates or in an alternative coordinate as long as the projection information for the coordinate system is also provided.
- Remediation activities: We request any and all information relating to remediation activities performed on the site mentioned above; this should include reports, results, and any other underlying data collected as a result of the remediation activities performed or proposed for the site.
- Communications: We request copy of any and all written communications between the USGS and concerned state agencies of Puerto Rico (i.e. the Environmental Quality Board, Health Department, Department of Natural and Environmental Resources, Puerto Rico Aqueduct and Sewers Authority, etc.) regarding any of the information herein requested.

We prefer that this information be provided in electronic format, as close to its native form as possible, (i.e., Laboratory Electronic Data Deliverables, spreadsheets, and database files). Regardless of the format provided, we request that the original laboratory deliverables be included, with sufficient information to correlate laboratory results with other information such as well identification and location.

We respectfully request that you respond to this inquiry within 20 days, as required by 5 U.S.C. § 552(a)(6)(A). If the volume of material responsive to this request is so voluminous as to constitute "unusual circumstances" under 5 U.S.C.

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§552(a)(6)(B)(iii), please contact us to discuss producing it in a staged fashion so that responsive information may be produced as it is available.

If necessary, we are willing to pay reasonable fees to accommodate efforts associated with the production of the requested information. Please do not hesitate to contact me if you have any questions regarding this FOIA request. Thank you, in advance, for all your assistance with this matter.

Sincerely,



Elaine Maldonado-Matías

Copy to: José C. Font
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